

BASF Corporation

- Non NPL
CD IN PLACE -
✓ INSPECT FOR OIL
NO OIL ⇒ REFER TO MDNR
FOR SA??

BASF

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

EPA: P 633 102 283

MDNR: P 633 102 284

August 4, 1994

Ms. Bonnie Eleder
Remedial Project Manager
CERCLA Enforcement Section
U.S. Environmental Protection Agency
230 Dearborn Street
Chicago, Illinois 60604



Mr. Steve Kitler
Michigan Department of Natural Resources
38980 Seven Mile Road
Livonia, Michigan 48152

Re: Civil Action 80-73699 Consent Decree

Dear Ms. Eleder:

Dear Mr. Kitler:

I have recently completed a comprehensive review of our files to verify compliance with the referenced Consent Decree. Based on this review it is my belief that BASF has fully complied with all of the sampling and analysis and well elevation measurement requirements of the Consent Decree. Please find attached a summary of data collected for all wells at the Riverview site since the inception of the Consent Decree. A review of all correspondence involving this Consent Decree between your offices and BASF reveals the following:

- BASF failed to formally give notice of it's intent to discontinue pentachlorophenol analysis for Well F. As can be found in the attachment for Well F there were ten consecutive analyses below the level of quantification for this parameter when sampling was discontinued in September 1987 which exceeds the six required by the Consent Decree.
- BASF failed to report the November 1992 monitoring data for Wells K, L and M. This data can be found in the attachment.
- BASF has submitted two letters to the MDNR (see attached) requesting direction on future semi-annual composite sampling as outlined in Section V.B.2.c of the Consent Decree. To our knowledge no response was received and therefore it is our belief that no additional sampling is required at this time.

This letter also serves as formal notification that a black oily liquid was discovered in Well M during the first quarter of 1994 while taking routine water level measurements at the site. A sample was collected and analyzed by FTIR and proton NMR. FTIR spectra were developed for kerosene, No. 2 and No. 6 fuel oils

August 4, 1994

for comparison. The spectrum for No. 6 fuel oil, without the volatiles, is very similar to that of the unknown. Copies of the laboratory results and the interpretations are attached. It is important to note that two storage tanks with fuel oil labels are located on property adjacent to the Riverview property and in close proximity to Well M.

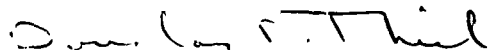
We would expect 50 - 70% of a drum spill to be bound in the capillary zone and in micelles within the soil interstices. In order to have free phase product in a well, the quantity spilled would be expected to be greater than one or two drums, which is the quantity we would expect if the material originated on the BASF Riverview property. We do not have sufficient data to estimate the volume of oil present but all available information points to the volume being significantly greater than that from one or two drums.

As a followup to this discovery groundwater levels were measured in May 1994 in an attempt to evaluate current groundwater flow patterns. At that time an oily material, similar in appearance to that found previously, was discovered in Well F which is a deeper well located immediately adjacent to Well M. The well elevation measurements indicate a bidirectional flow of groundwater in this area. Comparison of the equipotential lines shown in the attached contour models from the last two surveys show a south to north flow during the fall and a north to south flow during the spring. We are planning quarterly measurements in the future to further characterize groundwater flow. No free phase has been found in Wells H and I which are slightly southwest of Wells M and F. We would expect to see free phase in these wells if the oily material was originating from the Riverview property because of the north-south groundwater flow pattern that we have seen in our most recent surveys.

It is important to note that an interlocking sheet metal piling is in place along the river in the northeast corner of property and is anchored in the clay substrata which would minimize the loss of this product to the Detroit River. In addition, there has been no evidence during our routine visits to the site that there has been any loss of this product to the Detroit River.

We expect you will want to discuss this situation in more detail in the future. Please contact me to arrange for a possible meeting date.

Sincerely,



Douglas P. Thiel
Manager, Quality and Ecology Services Department

dpt/Attach.

249-6209

RIVERVIEW MONITORING SUMMARY

WELL A								
Date Sampled	Concentration (ppb)						Water Elevation (feet)	
	Benzo(a)pyrene	Naphthalene	Pentachlorophenol	PCB's	Arsenic	Mercury	Well	Trenton Channel
16-Jun-85	ND	33	ND	ND	42	270	575.89	576.33
16-Sep-85	ND	30	ND	ND	50	ND	575.51	576.53
19-Dec-85	<10	<1	22	1	8.7	11	575.44	576.28
12-Mar-86	ND	ND	ND	ND	74	ND	575.80	576.00
18-Jun-86	ND	35	ND	ND	620	14	576.11	576.96
26-Sep-86	ND	<20	ND	ND	300	8	575.94	575.58
09-Dec-86	ND	31	ND	ND	57	20	576.38	576.63
10-Mar-87	15	85	ND	ND	60	23	576.11	576.46
04-Aug-87	<1	12	20	-	58	42	575.42	576.08
22-Sep-87	ND	123	ND	-	130	37	575.27	575.53
08-Dec-87	36	3	1	-	110	29	575.02	575.00
29-Mar-88	ND	44	ND	-	120	47	574.57	574.88
14-Jun-88	ND	ND	ND	-	120	10	574.37	573.07
09-Jun-89	<10	<35	<15	-	88	6	575.11	575.11
04-Jun-90	<10	<10	<250	-	160	49	574.57	574.98

Notes: ND = Not Detected; less than the method detection limit (MDL)

<# = Greater than the MDL but less than the practical quantification limit

Letter sent to EPA and MDNR by CWAXce on May 19, 1987 providing notification of intent to discontinue PCB analysis.

RIVERVIEW MONITORING SUMMARY

WELL B								
Date Sampled	Concentration (ppb)						Water Elevation (feet)	
	Benzo(a)pyrene	Naphthalene	Pentachlorophenol	PCB's	Arsenic	Mercury	Well	Trenton Channel
16-Jun-85	ND	1216	ND	ND	43	760	575.70	576.33
11-Sep-85	ND	1474	ND	ND	50	1	575.73	576.53
17-Dec-85	<40	643	<20	<40	160	280	575.08	576.28
11-Mar-86	ND	ND	ND	ND	600	40	575.30	576.00
18-Jun-86	ND	185	ND	ND	1130	240	576.01	576.96
26-Sep-86	ND	156	ND	ND	900	22	575.86	575.58
09-Dec-86	ND	368	ND	ND	500	600	576.50	576.63
10-Mar-87	203	1184	6449	ND	610	36	576.13	576.46
04-Aug-87	70	1032	2016	-	360	83	575.38	576.08
22-Sep-87	55	2236	479	-	780	74	575.23	575.53
08-Dec-87	372	384	140	-	460	84	574.75	575.00
29-Mar-88	1900	3900	2600	-	520	59	574.61	574.88
14-Jun-88	ND	ND	ND	-	760	54	574.29	573.07
09-Jun-89	<100	<650	<1400	-	420	28	574.78	575.11
04-Jun-90	<100	<1000	<500	-	580	85	574.26	574.98

Notes: ND = Not Detected; less than the method detection limit (MDL)

<# = Greater than the MDL but less than the practical quantification limit

Letter sent to EPA and MDNR by CWAXce on May 19, 1987 providing notification of intent to discontinue PCB analysis.

RIVERVIEW MONITORING SUMMARY

WELL C								
Date Sampled	Concentration (ppb)						Water Elevation (feet)	
	Benzo(a)pyrene	Naphthalene	Pentachlorophenol	PCB's	Arsenic	Mercury	Well	Trenton Channel
16-Jun-85	ND	340	ND	ND	96	350	575.68	576.33
11-Sep-85	ND	993	ND	ND	400	ND	575.50	576.53
17-Dec-85	<20	12	<10	<20	87	210	575.08	576.28
11-Mar-86	ND	ND	ND	ND	370	20	575.10	576.00
18-Jun-86	ND	269	ND	ND	1160	46	576.03	576.96
26-Sep-86	ND	145	ND	ND	800	18	575.91	575.58
09-Dec-86	ND	734	ND	ND	194	97	576.38	576.63
10-Mar-87	62	224	1239	ND	200	92	576.06	576.46
04-Aug-87	25	360	204	-	500	320	575.28	576.08
22-Sep-87	3	391	160	-	630	85	575.14	575.53
08-Dec-87	28	94	23	-	110	350	574.71	575.00
29-Mar-88	480	540	390	-	360	170	574.55	574.88
14-Jun-88	ND	ND	ND	-	610	30	574.20	573.07
09-Jun-89	<50	<410	<100	-	280	45	574.70	575.11
04-Jun-90	<10	<100	<400	-	520	88	574.16	574.98

Notes: ND = Not Detected; less than the method detection limit (MDL)

<# = Greater than the MDL but less than the practical quantification limit

Letter sent to EPA and MDNR by CWAXce on May 19, 1987 providing notification of intent to discontinue PCB analysis.

RIVERVIEW MONITORING SUMMARY

WELL D								
Date Sampled	Concentration (ppb)						Water Elevation (feet)	
	Benzo(a)pyrene	Naphthalene	Pentachlorophenol	PCB's	Arsenic	Mercury	Well	Trenton Channel
16-Jun-85	ND	3728	ND	ND	6400	3100	576.02	576.33
11-Sep-85	ND	1026	ND	ND	24000	4	575.72	576.53
19-Dec-85	<20	1014	<10	<20	5950	1300	575.72	576.28
11-Mar-86	ND	ND	ND	ND	5900	130	575.60	576.00
18-Jun-86	ND	344	ND	ND	27800	240	575.65	576.96
26-Sep-86	ND	212	ND	ND	18000	300	576.02	575.58
09-Dec-86	ND	1138	ND	ND	5600	650	576.95	576.63
10-Mar-87	ND	714	633	ND	9000	610	576.14	576.46
04-Aug-87	-	24	344	-	7100	1800	575.07	576.08
22-Sep-87	-	2464	600	-	13	1600	575.99	575.53
08-Dec-87	-	80	22	-	6900	460	576.47	575.00
29-Mar-88	-	710	ND	-	7200	660	576.40	574.88
14-Jun-88	-	ND	ND	-	13000	140	574.07	573.07
09-Jun-89	-	<510	<15	-	8300	660	572.07	575.11
04-Jun-90	-	<200	<250	-	9200	1400	575.80	574.98

Notes: ND = Not Detected; less than the method detection limit (MDL)

<# = Greater than the MDL but less than the practical quantification limit

Letter sent to EPA and MDNR by CWaxce on May 19, 1987 providing notification of intent to discontinue Benzo(a)pyrene and PCB analyses.

RIVERVIEW MONITORING SUMMARY

WELL E								
Date Sampled	Concentration (ppb)						Water Elevation (feet)	
	Benzo(a)pyrene	Naphthalene	Pentachlorophenol	PCB's	Arsenic	Mercury	Well	Trenton Channel
16-Jun-85	ND	1002	ND	ND	9000	4900	575.57	576.33
16-Sep-85	ND	770	ND	ND	22000	9	576.17	576.53
17-Dec-85	<33	<3.3	69	<3.3	6200	1400	575.72	576.28
11-Mar-86	ND	ND	ND	ND	5400	110	575.60	576.00
18-Jun-86	ND	279	ND	ND	26100	440	575.73	576.96
26-Sep-86	ND	65	ND	ND	36000	360	576.05	575.58
09-Dec-86	ND	558	ND	ND	5000	2500	576.85	576.63
10-Mar-87	90	648	688	ND	9100	1130	576.23	576.46
04-Aug-87	15	127	168	-	7900	2300	575.17	576.08
22-Sep-87	2	148	ND	-	11000	1700	576.10	575.53
08-Dec-87	15	9	ND	-	1900	510	576.65	575.00
29-Mar-88	ND	150	ND	-	3200	1100	576.60	574.88
14-Jun-88	ND	ND	ND	-	12000	120	574.27	573.07
09-Jun-89	<50	<320	<10	-	8400	190	576.20	575.11
04-Jun-90	<10	<200	<75	-	8200	1900	575.90	574.98

Notes: ND = Not Detected; less than the method detection limit (MDL)

<# = Greater than the MDL but less than the practical quantification limit

Letter sent to EPA and MDNR by CWaxce on May 19, 1987 providing notification of intent to discontinue PCB analysis.

RIVERVIEW MONITORING SUMMARY

WELL F								
Date Sampled	Concentration (ppb)						Water Elevation (feet)	
	Benzo(a)pyrene	Naphthalene	Pentachlorophenol	PCB's	Arsenic	Mercury	Well	Trenton Channel
16-Jun-85	<21	7	ND	ND	56	2900	576.86	576.33
16-Sep-85	ND	40	ND	ND	200	3	577.36	576.53
17-Dec-85	<20	325	<10	<20	70	180	577.36	576.28
11-Mar-86	ND	ND	ND	ND	42	20	576.70	576.00
18-Jun-86	ND	ND	ND	ND	1080	16	577.21	576.96
26-Sep-86	ND	ND	ND	ND	1800	5	577.26	575.58
09-Dec-86	ND	41	ND	ND	340	22	578.33	576.63
10-Mar-87	ND	5	ND	ND	100	14	577.68	576.46
04-Aug-87	-	<1	<1	-	220	58	577.78	576.08
22-Sep-87	-	ND	ND	-	450	22	577.02	575.53
08-Dec-87	-	ND	-	-	130	ND	577.39	575.00
29-Mar-88	-	ND	-	-	65	11	577.33	574.88
14-Jun-88	-	ND	-	-	160	16	576.11	573.07
09-Jun-89	-	<10	-	-	14	120	578.29	575.11
04-Jun-90	-	<500	-	-	160	130	577.14	574.98

Notes: ND = Not Detected; less than the method detection limit (MDL)

<# = Greater than the MDL but less than the practical quantification limit

Letter sent to EPA and MDNR by CWaxce on May 19, 1987 providing notification of intent to discontinue Benzo(a)pyrene and PCB analyses.

RIVERVIEW MONITORING SUMMARY

WELL G								
Date Sampled	Concentration (ppb)						Water Elevation (feet)	
	Benzo(a)pyrene	Naphthalene	Pentachlorophenol	PCB's	Arsenic	Mercury	Well	Trenton Channel
16-Jun-85	ND	6	ND	ND	45	13	576.90	576.33
16-Sep-85	ND	22	ND	ND	400	ND	576.50	576.53
19-Dec-85	<10	38	4	<1	8.5	15	576.90	576.28
11-Mar-86	ND	20	ND	ND	7	ND	576.90	576.00
18-Jun-86	ND	ND	ND	ND	900	7	576.80	576.96
26-Sep-86	ND	ND	ND	ND	300	ND	576.22	575.58
09-Dec-86	ND	ND	ND	ND	40	4	578.20	576.63
10-Mar-87	ND	2	ND	ND	16	<10	577.03	576.46
04-Aug-87	-	3	9	-	120	<20	576.60	576.08
22-Sep-87	-	89	ND	-	620	ND	576.34	575.53
08-Dec-87	-	ND	ND	-	70	ND	576.12	575.00
29-Mar-88	-	ND	ND	-	22	ND	577.35	574.88
14-Jun-88	-	ND	ND	-	100	6	576.25	573.07
09-Jun-89	-	<10	<15	-	22	8	577.40	575.11
04-Jun-90	-	<10	<10	-	220	17	576.86	574.98

Notes: ND = Not Detected; less than the method detection limit (MDL)

<# = Greater than the MDL but less than the practical quantification limit

Letter sent to EPA and MDNR by CWAXce on May 19, 1987 providing notification of intent to discontinue Benzo(a)pyrene, Pentachlorophenol and PCB analyses.

Letter received from Bonnie Eleder of EPA dated July 15, 1987 disapproves of discontinuing pentachlorophenol analysis because only 5 consecutive periods of "no detection" had passed.

Letter from HDRoush sent on November 13, 1987 to discontinue PCB analysis. Well G should have read Well I in this letter.

RIVERVIEW MONITORING SUMMARY

WELL H								
Date Sampled	Concentration (ppb)						Water Elevation (feet)	
	Benzo(a)pyrene	Naphthalene	Pentachlorophenol	PCB's	Arsenic	Mercury	Well	Trenton Channel
16-Jun-85	119	1698	ND	ND	110	2200	574.83	576.33
16-Sep-85	ND	5428	ND	ND	250	20	574.53	576.53
19-Dec-85	<20	46	<2	<2	63	1900	575.28	576.28
11-Mar-86	ND	330	ND	ND	580	400	572.80	576.00
18-Jun-86	ND	19	ND	ND	540	2	574.68	576.96
26-Sep-86	ND	ND	ND	ND	300	12	576.18	575.58
09-Dec-86	ND	24	ND	ND	230	6	575.70	576.63
10-Mar-87	14	57	ND	ND	190	<10	573.98	576.46
04-Aug-87	1	7	-	-	160	<10	576.27	576.08
22-Sep-87	ND	11	-	-	320	ND	576.23	575.53
08-Dec-87	ND	ND	-	-	170	ND	576.59	575.00
29-Mar-88	ND	21	-	-	170	ND	573.49	574.88
14-Jun-88	ND	ND	-	-	170	5	574.05	573.07
09-Jun-89	<10	<10	-	-	150	5	574.87	575.11
04-Jun-90	ND	<10	-	-	<100	8	575.62	574.98

Notes: ND = Not Detected; less than the method detection limit (MDL)

<# = Greater than the MDL but less than the practical quantification limit

Letter sent to EPA and MDNR by CWaxce on May 19, 1987 providing notification of intent to discontinue Pentachlorophenol and PCB analyses.

RIVERVIEW MONITORING SUMMARY

WELL I								
Date Sampled	Concentration (ppb)						Water Elevation (feet)	
	Benzo(a)pyrene	Naphthalene	Pentachlorophenol	PCB's	Arsenic	Mercury	Well	Trenton Channel
16-Jun-85	337	155	ND	ND	3900	460	576.51	576.33
16-Sep-85	ND	76	ND	ND	10000	ND	576.21	576.53
19-Dec-85	<20	19	<2	<1	380	250	573.26	576.28
11-Mar-86	ND	ND	ND	0.14	1800	ND	575.50	576.00
18-Jun-86	ND	19	ND	ND	2010	7	576.39	576.96
26-Sep-86	ND	ND	ND	ND	500	<1	576.66	575.58
09-Dec-86	ND	62	ND	ND	500	16	577.04	576.63
10-Mar-87	6	7	ND	ND	410	11	576.09	576.46
04-Aug-87	ND	ND	-	ND	480	20	576.81	576.08
22-Sep-87	3	ND	-	ND	960	ND	576.62	575.53
09-Dec-87	ND	ND	-	-	160	ND	576.65	575.00
29-Mar-88	100	15	-	-	140	ND	576.77	574.88
14-Jun-88	ND	ND	-	-	550	10	575.62	573.07
09-Jun-89	<13	<10	-	-	260	18	577.74	575.11
04-Jun-90	<10	<10	-	-	120	5	577.16	574.98

Notes: ND = Not Detected; less than the method detection limit (MDL)

<# = Greater than the MDL but less than the practical quantification limit

Letter sent to EPA and MDNR by CWAXce on May 19, 1987 providing notification of intent to discontinue Pentachlorophenol and PCB analyses.

Letter received from Bonnie Eleder of EPA dated July 15, 1987 disapproves of discontinuing PCB analysis because only 4 consecutive periods of "no detection" had passed.

Letter from HDRoush sent on November 13, 1987 to discontinue PCB analysis for Well G. Well G should have read Well I.

RIVERVIEW MONITORING SUMMARY

WELL J								
Date Sampled	Concentration (ppb)						Water Elevation (feet)	
	Benzo(a)pyrene	Naphthalene	Pentachlorophenol	PCB's	Arsenic	Mercury	Well	Trenton Channel
16-Jun-85	13	16	ND	ND	29	160	581.30	576.33
16-Sep-85	ND	160	ND	ND	100	ND	578.95	576.53
19-Dec-85	<10	18	<1	<1	27	11	578.40	576.28
11-Mar-86	ND	ND	ND	ND	47	ND	576.40	576.00
18-Jun-86	ND	451	ND	ND	170	880	574.16	576.96
26-Sep-86	ND	163	ND	ND	1100	1020	576.37	575.58
09-Dec-86	ND	265	ND	ND	690	830	576.82	576.63
10-Mar-87	110	417	411	ND	600	540	576.32	576.46
04-Aug-87	47	2250	94	-	320	660	576.08	576.08
22-Sep-87	31	2910	ND	-	870	610	577.00	575.53
09-Dec-87	171	1300	2	-	340	580	575.93	575.00
29-Mar-88	460	3200	ND	-	290	550	576.18	574.88
14-Jun-88	ND	ND	ND	-	300	410	576.65	573.07
09-Jun-89	<300	<2500	<1300	-	250	380	578.30	575.11
04-Jun-90	<100	<1000	<250	-	180	3	578.87	574.98

Notes: ND = Not Detected; less than the method detection limit (MDL)

<# = Greater than the MDL but less than the practical quantification limit

Letter sent to EPA and MDNR by CWaxce on May 19, 1987 providing notification of intent to discontinue PCB analysis.

RIVERVIEW MONITORING SUMMARY

WELL K								
Date Sampled	Concentration (ppb)						Water Elevation (feet)	
	Benzo(a)pyrene	Naphthalene	Pentachlorophenol	PCB's	Arsenic	Mercury	Well	Trenton Channel
22-Sep-87	4	95	ND	-	990	8400	575.97	575.53
08-Dec-87	24	19	1	-	520	3300	575.21	575.00
29-Mar-88	ND	31	ND	ND	230	1300	575.19	574.88
14-Jun-88	ND	ND	ND	ND	230	780	575.32	573.07
25-Oct-88	ND	ND	ND	ND	310	670	574.36	573.73
14-Mar-89	ND	ND	ND	ND	140	810	574.84	573.52
19-Jun-89	ND	70	150	ND	180	54	575.46	575.11
22-Sep-89	ND	ND	ND	ND	16	680	575.57	574.68
12-Dec-89	-	ND	ND	-	100	580	574.78	573.53
27-Mar-90	-	<2300	ND	-	230	220	575.52	574.73
04-Jun-90	-	<10	<35	-	140	220	575.96	574.98
26-Sep-90	-	9	22	-	74	230	575.77	574.63
12-Dec-90	-	9	25	-	215	195	575.59	574.12
10-Jun-91	-	ND	5	-	40	150	575.87	575.43
10-Nov-92	<440	2400	<93	-	44	83	573.93	572.82
30-Dec-93	-	<10	ND	-	<30	1.4	573.43	572.39
28-Mar-94	-	<19	<280	-	<60	36	573.87	572.39

Notes: ND = Not Detected; less than the method detection limit (MDL)

<# = Greater than the MDL but less than the practical quantification limit

Letter sent to EPA and MDNR by HDRoush on October 24, 1989 providing notification of intent to discontinue Benzo(a)pyrene and PCB analyses.

Data from December 30, 1993 and March 28, 1994 has not been and is not required to be submitted to the agencies.

RIVERVIEW MONITORING SUMMARY

WELL L								
Date Sampled	Concentration (ppb)						Water Elevation (feet)	
	Benzo(a)pyrene	Naphthalene	Pentachlorophenol	PCB's	Arsenic	Mercury	Well	Trenton Channel
22-Sep-87	ND	ND	ND	-	42	17	576.69	575.53
08-Dec-87	ND	ND	ND	-	29	16	577.29	575.00
29-Mar-88	ND	ND	ND	ND	30	17	576.95	574.88
14-Jun-88	ND	ND	ND	ND	30	9	575.53	573.07
25-Oct-88	ND	ND	ND	ND	45	15	575.19	573.73
14-Mar-89	ND	ND	ND	ND	23	16	576.10	573.52
19-Jun-89	ND	ND	ND	ND	62	33	575.14	575.11
22-Sep-89	11	ND	ND	ND	21	24	576.12	574.68
12-Dec-89	<10	-	-	-	ND	ND	575.71	573.53
27-Mar-90	ND	<10	-	-	11	2	577.14	574.73
04-Jun-90	ND	ND	-	-	ND	6	576.96	574.98
26-Sep-90	ND	ND	-	-	ND	6	577.39	574.63
12-Dec-90	ND	7	-	-	95	6	577.00	574.12
10-Jun-91	ND	ND	-	-	<20	5	576.33	575.43
10-Nov-92	<110	<23	-	-	ND	3	575.83	572.82
30-Dec-93	ND	ND	-	-	ND	56	575.15	572.39
28-Mar-94	<3.8	<3.9	-	-	ND	1.2	574.50	572.39

Notes: ND = Not Detected; less than the method detection limit (MDL)

<# = Greater than the MDL but less than the practical quantification limit

Letter sent to EPA and MDNR by HDRoush on October 24, 1989 providing notification of intent to discontinue Benzo(a)pyrene, Naphthalene and PCB analyses.

Data from December 30, 1993 and March 28, 1994 has not been and is not required to be submitted to the agencies.

RIVERVIEW MONITORING SUMMARY

WELL M								
Date Sampled	Concentration (ppb)						Water Elevation (feet)	
	Benzo(a)pyrene	Naphthalene	Pentachlorophenol	PCB's	Arsenic	Mercury	Well	Trenton Channel
22-Sep-87	NA	NA	NA	NA	NA	NA	572.11	575.53
08-Dec-87	NA	NA	NA	NA	NA	NA	572.11	575.00
29-Mar-88	NA	NA	NA	NA	NA	NA	Dry	574.88
14-Jun-88	NA	NA	NA	NA	NA	NA	Dry	573.07
25-Oct-88	NA	NA	NA	NA	NA	NA	Dry	573.73
14-Mar-89	NA	NA	NA	NA	NA	NA	Dry	573.52
19-Jun-89	NA	NA	NA	NA	NA	NA	Dry	575.11
22-Sep-89	NA	NA	NA	NA	NA	NA	Dry	574.68
12-Dec-89	NA	NA	NA	NA	NA	NA	Dry	573.53
27-Mar-90	NA	NA	NA	NA	NA	NA	Dry	574.73
04-Jun-90	NA	NA	NA	NA	NA	NA	Dry	574.98
26-Sep-90	NA	NA	NA	NA	NA	NA	Dry	574.63
12-Dec-90	NA	NA	NA	NA	NA	NA	Dry	574.12
10-Jun-91	NA	NA	NA	NA	NA	NA	Dry	575.43
10-Nov-92	NA	NA	NA	NA	NA	NA	Dry	572.82
30-Dec-93	NA	NA	NA	NA	NA	NA	Dry	572.39
28-Mar-94	NA	NA	NA	NA	NA	NA	Dry	572.39

Notes: NA = Not Applicable based on the definition of a "dry hole" in Section V.B.3.(c) of the Consent Decree.

Data from December 30, 1993 and March 28, 1994 has not been and is not required to be submitted to the agencies.